

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

JULIAN SANCTON, on behalf of himself and all
others similarly situated,

Plaintiff,

v.

OPENAI, INC., OPENAI GP, LLC, OPENAI,
LLC, OPENAI OPCO LLC, OPENAI GLOBAL
LLC, OAI CORPORATION, LLC, OPENAI
HOLDINGS, LLC, and MICROSOFT
CORPORATION,

Defendant.

ECF CASE

No. 1:23-cv-10211

**MOTION FOR ADMISSION OF
ATTORNEY PRO HAC VICE**

Pursuant to Rule 1.3 of the Local Rules of the United States District Court for the Southern District of New York, I, Justin A. Nelson, hereby move this Court for an Order for admission to practice *Pro Hac Vice* to appear as counsel for Plaintiff and the Proposed Class in the above-captioned action.

I am an active member in good standing of the Texas State Bar. There are no pending disciplinary proceedings against me in any state or federal court. I have never been convicted of a felony. I have never been censured, suspended, disbarred or denied admission or readmission by any court. I have attached my declaration pursuant to Local Rule 1.3, as well as a certificate of good standing from the Texas State Bar.

Dated: November 22, 2023

/s/ Justin A. Nelson

Justin A. Nelson
TX State Bar No. 24034766
SUSMAN GODFREY L.L.P.
1000 Louisiana Street, Suite 5100
Houston, TX 77002
Tel.: 713-651-9366
jnelson@susmangodfrey.com

Attorney for Plaintiff and the Proposed Class

CERTIFICATE OF SERVICE

I hereby certify this 22nd day of November 2023, I caused a true and correct copy of the foregoing to be electronically filed with the Clerk of the court using the CM/ECF system which will send notification to the attorneys of record and is available for viewing and downloading.

/s/ Justin A. Nelson

Justin A. Nelson